

MILMAN LABUDA LAW GROUP PLLC
3000 MARCUS AVENUE
SUITE 3W8
LAKE SUCCESS, NEW YORK

Author: Jamie S. Felsen - Member
Direct E-Mail Address: jamiefelsen@mllaborlaw.com
Direct Dial: (516) 303-1391

TELEPHONE (516) 328-8888
FACSIMILE (516) 328-0033

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: July 14, 2021

Via ECF

July 13, 2021

Hon. Victor Marrero, U.S.D.J.
United States District Court Southern District of New York
500 Pearl Street, Suite 160
New York, NY 10007

Re: Rosenfield & Co., PLLC v. Trachtenberg, Rodes & Friedberg LLP, et al.
Case No.: 21-CV-03858 (VM)

Dear Judge Marrero:

This firm represents all of the Defendants in the above-referenced matter with the exception of Trachtenberg, Rodes & Friedberg LLP (hereinafter “Star Defendants”).

The Star Defendants respectfully request an extension of time until July 30, 2021 to respond to the Answer and cross-claims. This is the second request for an extension of time to respond to same. The Star Defendants’ deadline to respond to the Complaint is currently July 16, 2021. All other parties have consented to this request for an extension. The reason for this request is that John Koufakis, Sr., the founder of the Star Defendants’ dealerships, passed away last week, and his family, who is involved in this litigation (including his sons who are dealer principals and his grandson who is an associate attorney assisting me in the defense of this case for the Star Defendants), is mourning his passing.

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen

cc: Counsel of Record (via ECF)

Request GRANTED.

The defendants' response to the Complaint is hereby due no later than July 30, 2021.

SO ORDERED.

July 14,
2021

DATE


VICTOR MARRERO, U.S.D.J.